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Attorneys for Defendant
CITISTAFF SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ AND
LAMAR PATTERSON

Plaintiffs,

v.

TESLA, INC. DBA TESLA MOTORS,
INC., CITISTAFF SOLUTIONS, INC.;
WEST VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES,
INC.; NEXTSOURCE, INC.; and
DOES 1-10, inclusive

Defendants.

Case No. 3:17-cv-06748-WHO

**CITISTAFF'S JOINDER IN DEFENDANTS'
JOINT REQUEST TO RETAIN
CONFIDENTIALITY OF DOCUMENTS**

Complaint Filed: October 16, 2017
Trial Date: May 11, 2020

Pursuant to the Court's December 30, 2019 Order, Defendant CitiStaff Solutions, Inc. ("CitiStaff") joins in with Defendants Joint Request to Retain Confidentiality of Documents filed on January 16, 2020 (Docket No. 149) and submits the following request to redact portions of two documents filed under seal in connection with defendants' summary judgment and partial summary judgment motions.

The chart below identifies the additional documents CitiStaff requests be maintained partially under seal, in redacted form. In support of these requests, the following declaration is submitted concurrently with this request: the Declaration; Declaration of Ludvinia Ledesma (for documents identified as "Confidential" by CitiStaff. This portion of the chart is arranged chronologically, by Docket Number.

DOCUMENTS TO BE MAINTAINED PARTIALLY UNDER SEAL			
Docket No.	Motion/Filing Party	Evidence Submitted	Description of Evidence
Docket No. 92	Plaintiffs' Opposition to CitiStaff's MSJ	Declaration of Larry Organ, Exh. A	CITISTAFF-000034-CITISTAFF-000035
	Requested Redactions: Redact Plaintiff, Owen Diaz's birthdate, address, telephone number, social security number and driver's license number		
Docket No. 116	nextSource's MSJ	Araneda Declaration of Juan Araneda, Exh. I	Exhibit 64 (CITISTAF-0000011-CITISTAFF-0000013)
	Requested Redactions: Redact references to former CitiStaff employee Rothaj Foster		
Docket No. 116	nextSource's MSJ	Declaration of Juan Araneda, Exh. D	5/22/18 O. Diaz Deposition testimony and Deposition Exhibits: Exhibit 1 (CITISTAFF-0000034-CITISTAFF0000035)
	Requested Redactions: Redact Plaintiff, Owen Diaz's birthdate, address, telephone number, social security number and driver's license number		

Based on the concurrently submitted declaration, CitiStaff respectfully request that the documents identified above be kept partially under seal with the proposed redactions.

Dated: January 17, 2020

LAFAYETTE & KUMAGAI

By /s/ Cheryl A. Stevens
 GARY T. LAFAYETTE
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 CITISTAFF SOLUTIONS, INC.